



Illinois Department of Financial and Professional Regulation

Division of Professional Regulation

JB PRITZKER
Governor

DEBORAH HAGAN
Secretary

CECILIA ABUNDIS
Acting Director
Division of Professional Regulation

September 18, 2019

Sent via Electronic Mail:

80236-49536650@requests.muckrock.com

Caroline Haskins
MuckRock News
DEPT MR 80236
411A Highland Ave
Somerville, MA 02144-2516

RE: Illinois Freedom of Information Act Request

Dear Ms. Haskins:

The Department of Financial and Professional Regulation (Department) received your Freedom of Information Act (FOIA) [5 ILCS 140/1 et seq.] request on September 12, 2019 requesting:

Pursuant to the Illinois Freedom of Information Act., I hereby request the following records:

Ring Protect Inc. is licensed to operate in this state and is regulated by this agency, according to Ring.com (<https://shop.ring.com/pages/licenses>). The license numbers are 127.001708 and 124.001917.

Therefore, I hereby request all records relating to Ring's ability to operate in the state. These documents could include:

1) All calendar invitations, instructional materials, presentations and presentation materials (including recorded video and audio, PowerPoint files, prepared remarks, and slides formats), and other documents that mention Ring devices and/or the Neighbors app. This includes A) any minutes/notes taking during meetings that discussed the use of Ring devices and/or the Neighbors app, B) any explanations (whether internally or externally generated) of how Ring devices and/or the Neighbors app work, and C) any other document that has been used to help explain the use, marketing, or promotion of

Ring devices and/or the Neighbors app to any party, including internal documentation, public relations materials, and executive summaries.

2) A copy of any privacy impact assessments, use policies, standard operating procedures, data retention policies, legal opinions, warranties, non-disclosure agreements, contracts, liability waivers, insurance agreements, Promotional Discount Agreements, Requests for Proposals, Responses to Requests for Proposal, Memorandums of Understanding, Letters of Interest, usage policies, or informal agreements between the city and Ring.

3) Any digital communications including but not limited to emails and text messages) as well as documents, (including but not limited to PDF, word processing, excel, and slide documents) that mention Ring or the Neighbors app.

4) Any digital communications (including but not limited to emails and text messages) with Ring representatives.

This letter is the Department's response to your FOIA request:

1) All calendar invitations, instructional materials, presentations and presentation materials (including recorded video and audio, PowerPoint files, prepared remarks, and slides formats), and other documents that mention Ring devices and/or the Neighbors app. This includes A) any minutes/notes taking during meetings that discussed the use of Ring devices and/or the Neighbors app, B) any explanations (whether internally or externally generated) of how Ring devices and/or the Neighbors app work, and C) any other document that has been used to help explain the use, marketing, or promotion of Ring devices and/or the Neighbors app to any party, including internal documentation, public relations materials, and executive summaries.

PDFs of the applications, renewal and insurance records are attached. Please be advised that your request is partially denied to the extent that the documents contain personal and private information, including signatures, social security numbers, FEIN numbers, personal addresses, personal email addresses, personal telephone numbers, maiden name, mother's maiden name, place of birth, date of birth, exam results, and insurance policy numbers, exempt from disclosure pursuant to Sections 7(1)(b) & (c) of FOIA [5 ILCS 140/7(1)(b) and (c)]. Additionally, the amount paid in capital and the allocation factor are proprietary financial information and are exempt from production pursuant to Section 7(1)(g) of FOIA [5 ILCS 140/7(1)(g)]. Finally, after a reasonable search tailored to the nature of your request, the Department was unable to locate any records that have been used to help explain the use, marketing or promotion of Ring devices and/or the Neighbors app.

2) A copy of any privacy impact assessments, use policies, standard operating procedures, data retention policies, legal opinions, warranties, non-disclosure agreements, contracts, liability waivers, insurance agreements, Promotional Discount Agreements, Requests for Proposals, Responses to Requests for Proposal, Memorandums of Understanding, Letters of Interest, usage policies, or informal agreements between the city and Ring.

PDFs of the insurance records are attached. Please be advised that your request is partially denied to the extent that the documents contain personal and private information, including signatures and insurance policy numbers, exempt from disclosure pursuant to Sections 7(1)(b) & (c) of FOIA [5 ILCS 140/7(1)(b) and (c)]. After a reasonable search tailored to the nature of your request, the Department was unable to locate any additional responsive documents.

3) Any digital communications including but not limited to emails and text messages) as well as documents, (including but not limited to PDF, word processing, excel, and slide documents) that mention Ring or the Neighbors app.

PDFs of the applications, renewal and insurance records are attached. Please be advised that your request is partially denied to the extent that the documents contain personal and private information, including signatures, social security numbers, FEIN numbers, personal addresses, personal email addresses, personal telephone numbers, maiden name, mother's maiden name, place of birth, date of birth, exam results, and insurance policy numbers, exempt from disclosure pursuant to Sections 7(1)(b) & (c) of FOIA [5 ILCS 140/7(1)(b) and (c)]. Additionally, the amount paid in capital and the allocation factor are proprietary financial information and are exempt from production pursuant to Section 7(1)(g) of FOIA [5 ILCS 140/7(1)(g)].

4) Any digital communications (including but not limited to emails and text messages) with Ring representatives.

Your request is denied; after a reasonable search tailored to the nature of your request, the Department was unable to locate any digital communications with Ring representatives.

Section 7(1) of FOIA states in pertinent part as follows:

Sec. 7. Exemptions.

- (1) When a request is made to inspect or copy a public record that contains information that is exempt from disclosure under this Section, but also contains information that is not exempt from disclosure, the public body may elect to redact the information that is exempt. The public body shall make the remaining information available for inspection and copying. Subject to this requirement, the following shall be exempt from inspection and copying:

(b) Private information, unless disclosure is required by another provision of this Act, a State or federal law or a court order.

(c) Personal information contained within public records, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, unless the disclosure is consented to in writing by the individual subjects of the information. "Unwarranted invasion of personal privacy" means the disclosure of information that is highly personal or objectionable to a

reasonable person and in which the subject's right to privacy outweighs any legitimate public interest in obtaining the information. The disclosure of information that bears on the public duties of public employees and officials shall not be considered an invasion of personal privacy.

(g) Trade secrets and commercial or financial information obtained from a person or business where the trade secrets or commercial or financial information are furnished under a claim that they are proprietary, privileged or confidential, and that disclosure of the trade secrets or commercial or financial information would cause competitive harm to the person or business, and only insofar as the claim directly applies to the records requested.

This determination has been made by the Illinois Department of Financial and Professional Regulation, FOIA officer Lisa R. Schlessinger.

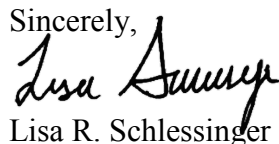
You have the right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. You can file your Request for Review with the PAC by writing to:

Sarah Pratt
Public Access Counselor
Office of the Attorney General
500 S. 2nd Street
Springfield, Illinois 62706
(877) 299-3642

You also have the right to judicial review of your denial by filing a lawsuit in the State circuit court. 5 ILCS 140/11.

If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this denial letter. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and this denial letter when filing a Request for Review with the PAC.

Please contact me should you have any questions or concerns.

Sincerely,


Lisa R. Schlessinger
Associate General Counsel